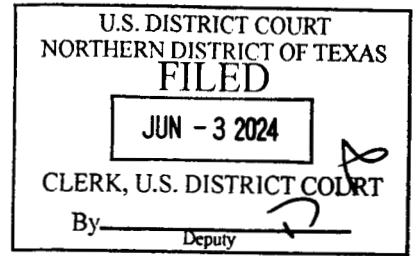


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION



UNITED STATES OF AMERICA

v.

NO. 2:24-cr-00038-Z-BR

AMY DIXON

INFORMATION

The United States Attorney Charges:

Introduction

At all times material to this Information:

1. The defendant, **Amy Dixon**, was an agent of the City of Amarillo.

Specifically, Dixon was employed as the Homeless Management Information Specialist and Grant Manager in the Community Development Department.

2. In each of the one-year periods from January 1, 2020, through December 1, 2023, the City of Amarillo received benefits in excess of \$10,000 in subsidies from the United States Department of Housing and Urban Development through the Emergency Solutions Grant (ESG) Program.

Count One

Conspiracy to Embezzle from a Federally Funded Program
(Violation of 18 U.S.C. § 371)

3. Paragraphs One and Two of this Information are re-alleged and incorporated by reference as though fully set forth herein.

4. Beginning on or about a date unknown, but as early as September 2020, and continuing until in or around April 2023, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Amy Dixon**, defendant, did knowingly and willfully combine, conspire, confederate, and agree with persons known and unknown to the United States to knowingly steal, embezzle, and obtain by fraud, property having an aggregate value of \$5,000 and more, which was owned by, and under the care, custody, and control of, the City of Amarillo. In violation of Title 18, United States Code, Sections 666(a)(1)(A).

5. In furtherance of the conspiracy, the defendant and her co-conspirators knowingly committed overt acts, including, but not limited to, the following:
Dixon created at least 223 fraudulent Payment Vouchers, resulting in 66 checks written to her relative, a fictitious landlord, which she converted to her own use by depositing in her personal bank accounts. Such check payments were funds owned by, and under the care, custody, and control of, the City of Amarillo and were provided from the United States Department of Housing and Urban Development through the ESG Program.

All in violation of Title 18, United States Code, Section 371.

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